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April 2, 2015

BY HAND

The Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

**RE: Ironshore Specialty Insurance Company v.
Cedar Grove Composting, Inc.,
Cause No. 15-cv-975 (NRB)**

Dear Judge Buchwald:

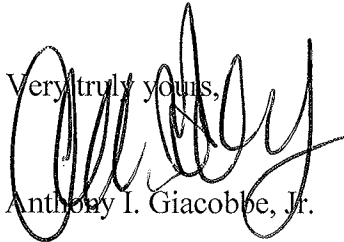
Cedar Grove Composting, Inc. ("Cedar Grove") requests that the Court stay this action pending determination by the United States District Court for the Western District of Washington of which of the two competing actions now at issue – the Washington action filed in August of 2014 ("Washington Action") or this case filed by Ironshore earlier this year ("New York Action") – qualifies as the first-filed case under the first-to-file rule. That issue has already been fully briefed to the Court in the Western District of Washington and the parties are awaiting a decision in that case from United States District Judge Richard A. Jones.

The competing Washington and New York Actions involve the same parties and the same coverage issues, including coverage for the same defense costs incurred in defending the same Underlying Actions. For that reason, Cedar Grove filed a Motion for Declaration of Proper Forum Under First-to-File Rule in the Washington Action, requesting that Judge Jones determine which of the two competing actions qualifies as the "first-filed" action under the first-to-file rule. Ironshore fully responded to that motion, did not dispute the fact that Judge Jones was the appropriate decision-maker with regard to that issue, and the parties expect that Judge Jones will issue a decision with regard to that issue in the short term.

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Given these facts, a temporary stay of these proceedings is appropriate until such time as Judge Jones determines the first-to-file issue. Granting this limited stay will conserve the resources of the Court and the parties, and will best allow for the orderly resolution of the conflict created by Ironshore's decision to file this unnecessary action in New York.

Very truly yours,

Anthony I. Giacobbe, Jr.

AIG:bs
Enclosure

cc: Adam I. Stein, Esq. (via email)